



June 20, 2016

Liz Hagenmaier  
Remedial Project Manager  
Superfund Division - Special Emphasis Branch  
U.S. Environmental Protection Agency - Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219

**SUBJECT: *Draft Feasibility Study Cherokee County Operable Unit 8 Railroads Site, Cherokee County, Kansas***

Dear Ms. Hagenmaier:

The Kansas Department of Health and Environment (KDHE), Bureau of Environmental Remediation has reviewed the referenced subject document. KDHE includes the following comments for your consideration.

Of the action remedial alternatives KDHE supports *Alternative 3: Source Removal, Off-Site Waste Consolidation and Capping*. This alternative includes removing contaminated source material and transporting it to a central consolidation area that is part of the OU4 Phase 3 Baxter Springs/Treece remedial action. Assumptions of this alternative are that the consolidation area has adequate capacity to receive material, is located within a 20-mile radius of each removal area, and will be concurrently under construction. Considering the comparative analysis alternative 3 has acceptable threshold criteria and scores slightly higher overall for balancing criteria.

Though not considered in remedial alternative formulation and analysis KDHE weighs heavily the feasibility of placing and maintaining environmental use control (EUC) deed restrictions and the state's foreseen long-term maintenance responsibility. KDHE anticipates successfully implementing EUC agreements on one or a few consolidation areas versus numerous or miles of linear consolidation areas proposed under alternatives 2 and 4. Fewer consolidation areas also would reduce estimated long-term maintenance and related costs.

Thank you for providing KDHE the opportunity to review and comment. If you have any questions, please contact me using the information in the top right letterhead.

Sincerely,

Chris D. Hase  
Project Manager

SCANNED

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cc: File: Cherokee County → C3-011-73152 (1)

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